

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

AMERICAN CIVIL LIBERTIES UNION OF
MASSACHUSETTS, INC.,

Plaintiff,

v.

U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT,

Defendant.


Civil Action No. 1:22-cv-10407-PBS

DECLARATION OF MEDHA SWAMINATHAN

Pursuant to 28 U.S.C § 1746, I hereby declare as follows:

1. My name is Medha Swaminathan. I am an attorney licensed to practice in Maryland and am appearing in this matter *pro hac vice* with leave of Court. I am a Liman Fellow at the American Civil Liberties Union of Massachusetts (ACLUM).
2. Attached as Exhibit 1 is a true and correct copy of a record obtained by ACLUM. It is my understanding that this record was disclosed by ICE in response to an unrelated Freedom of Information Act request by Betsy Ginsberg of the Immigration Justice Clinic at Benjamin N. Cardozo School of Law. I added annotations to this record to demonstrate which previously released material has been inconsistently redacted by ICE in the present production.

Executed on this 22 day of December 2022, Massachusetts



Medha Swaminathan